

RAMIRO MORALES, # 007101  
rmorales@mfrlegal.com  
MORALES FIERRO & REEVES  
600 Tonopah Drive, Suite 300  
Las Vegas, NV 89106  
Telephone: (702) 699-7822  
Facsimile: (702) 699-9455

Attorneys for Defendant ST. PAUL FIRE  
AND MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CENTEX HOMES, a Nevada general  
partnership,

Plaintiff,

vs.

NAVIGATORS SPECIALTY INSURANCE  
COMPANY, a New York corporation;  
EVEREST NATIONAL INSURANCE  
COMPANY, a Delaware corporation;  
INTERSTATE FIRE & CASUALTY  
COMPANY, an Illinois corporation;  
LEXINGTON INSURANCE COMPANY, a  
Delaware corporation; FEDERAL  
INSURANCE COMPANY, an Indiana  
corporation; and UNDERWRITERS AT  
LLOYDS LONDON, an England corporation;  
ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY, a Connecticut  
corporation,

Defendants.

CASE NO.: 2:16-cv-01958 JAD-VCF

STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME TO  
FILE RESPONSIVE PLEADING TO  
PLAINTIFF'S COMPLAINT

(First Request)

Defendant St. Paul Fire and Marine Insurance Company ("St. Paul"), by and through its counsel of record, Ramiro Morales, of the Law Offices of Morales Fierro & Reeves, and Plaintiff Centex Homes, by and through its counsel of record, Sarah J. Odia, of Payne & Fears LLP, hereby stipulate and agree to extend the deadline for St. Paul's filing of a response to Plaintiff's complaint by 30 days, from November 30, 2016, to December 30, 2016. There is an early mediation set for this matter on December 14, 2016. The parties

1 have agreed to this extension of time in order to allow the parties the opportunity to fully investigate informal  
2 resolution prior to incurring the cost and expense of further litigation, as well as the expenditure of additional  
3 judicial resources.

4 This is the first stipulation for the extension of St. Paul's time to respond to Plaintiff's complaint.

5 DATED: November 28, 2016

MORALES FIERRO & REEVES

7 By /s/ Ramiro Morales  
8 Ramiro Morales, Esq.  
600 South Tonopah Drive, Suite 300  
9 Las Vegas, NV 89106  
Telephone: (702) 699-7822

10 Attorneys for Defendant ST. PAUL FIRE  
11 AND MARINE INSURANCE COMPANY

12 DATED: November 28, 2016

PAYNE & FEARS LLP

14 By: /s/ Sarah J. Odia  
15 Scott S. Thomas, Esq.  
Sarah J. Odia, Esq.  
16 7251 W. Lake Mead Blvd., Suite 525  
17 Las Vegas, NV 89128  
Telephone: (702) 851-0300

18 Attorneys for Plaintiff CENTEX HOMES

20 **[PROPOSED] ORDER**

21 IT IS SO ORDERED: Defendant St. Paul Fire and Marine Insurance Company's response  
22 to Plaintiff's Complaint is due on or before December 30, 2016.

24 Dated: November 29, 2016

25   
26 UNITED STATES ~~DISTRICT~~ COURT JUDGE  
27 MAGISTRATE  
28